

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JASMIN ALEXANDRIA FOX, LEVI
ALLEN DOOLIN and GARNETT ADAM
PROPST,

Defendants.

) No. 24-CR-00026

) **INDICTMENT**

) **Counts 1, 3 & 6**

) 18 U.S.C. § 922(a)(6): False
) Statement During Purchase of
) Firearm
) (FOX)

) **Counts 2, 4**

) 18 U.S.C. §§ 2, 922(a)(6): Aiding and
) Abetting False Statement During
) Purchase of Firearm
) (DOOLIN & PROPST)

) **Count 5**

) 18 U.S.C. § 922(g)(1): Possession of
) a Firearm by a Felon
) (PROPST)

) **Count 7**

) 18 U.S.C. §§ 2, 922(a)(6): Aiding and
) Abetting False Statement During
) Purchase of Firearm
) (DOOLIN)

) **Forfeiture**

The Grand Jury charges:

Count 1

False Statement During Purchase of a Firearm

On or about the August 14, 2023, in the Northern District of Iowa, defendant, JASMIN ALEXANDRIA FOX, in connection with the acquisition of a firearm, a Glock, 9x19 caliber, pistol, from FFL#1, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to FFL#1, which statement was intended and likely to deceive FFL#1, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that defendant represented the firearm she was purchasing was for herself, when in fact defendant intended to purchase the firearm on behalf of another person.

This was in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

Count 2

Aiding and Abetting False Statement During Purchase of a Firearm

On or about August 14, 2023, in the Northern District of Iowa, defendants, LEVI ALLEN DOOLIN and GARNETT ADAM PROPST, in connection with the acquisition of a firearm, a Glock, 9x19 caliber, pistol, from FFL#1, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly aided, abetted, counseled, commanded, induced, and procured the making of a false and fictitious written statement to FFL#1, which statement was

intended and likely to deceive FFL#1, as to a fact material to the lawfulness of such sale of the said firearm under Chapter 44 of Title 18, in that defendants caused another to falsely represent that the other person was the actual transferee/buyer of said firearm.

This was in violation of Title 18, United States Code, Sections 2, 922(a)(6) and 924(a)(2).

Count 3

False Statement During Purchase of a Firearm

On or about the September 12, 2023, in the Northern District of Iowa, defendant, JASMIN ALEXANDRIA FOX, in connection with the acquisition of two firearms, a Beretta, APX, 9x19mm, pistol, from FFL#2, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to FFL#2, which statement was intended and likely to deceive FFL#2, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented the firearm she was purchasing was for herself, when in fact defendant purchased the firearm on behalf of another person.

This was in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

Count 4

Aiding and Abetting False Statement During Purchase of a Firearm

On or about September 12, 2023, in the Northern District of Iowa, defendants, LEVI ALLEN DOOLIN and GARNETT ADAM PROPST, in connection with the acquisition of a firearm, a Beretta, APX, 9x19mm, Pistol, from FFL#2, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly aided, abetted, counseled, commanded, induced, and procured the making of a false and fictitious written statement to FFL#2, which statement was intended and likely to deceive FFL#2, as to a fact material to the lawfulness of such sale of the said firearm under Chapter 44 of Title 18, in that defendants caused another to falsely represent that the other person was the actual transferee/buyer of said firearm.

This was in violation of Title 18, United States Code, Sections 2, 922(a)(6) and 924(a)(2).

Count 5

Possession of a Firearm by a Felon

On or about September 12, 2023, in the Northern District of Iowa, defendant GARNETT ADAM PROPST, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, specifically, a Beretta, APX, 9x19mm, pistol, and the firearm was in and affecting commerce.

Defendant was previously convicted of the following crime punishable by imprisonment for a term exceeding one year: Conspiracy to Commit a Felony (nonforcible), in the Iowa District Court for Linn County, on or about March 7, 2023, in case number FECR145479.

This was in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

Count 6

False Statement During Purchase of a Firearm

On or about the September 22, 2023, in the Northern District of Iowa, defendant, JASMIN ALEXANDRIA FOX, in connection with the acquisition of a firearm, a Taurus, PT111 G2 A, 9x19mm, pistol, from FFL# 3, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to FFL#3, which statement was intended and likely to deceive FFL#3, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented the firearm she was purchasing was for herself, when in fact defendant purchased the firearm on behalf of another person.

This was in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

Count 7

Aiding and Abetting False Statement During Purchase of a Firearm

On or about September 22, 2023, in the Northern District of Iowa, defendant, LEVI ALLEN DOOLIN, in connection with the acquisition of a firearm, a Taurus, PT111 G2 A, 9x19mm, pistol, from FFL#3, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly aided, abetted, counseled, commanded, induced, and procured the making of a false and fictitious written statement to FFL#3, which statement was intended and likely to deceive FFL#3, as to a fact material to the lawfulness of such sale of the said firearm under Chapter 44 of Title 18, in that defendant caused another to falsely represent that the other person was the actual transferee/buyer of said firearm.

This was in violation of Title 18, United States Code, Sections 2, 922(a)(6) and 924(a)(2).

Forfeiture Allegation

By virtue of having committed the acts specified in this Indictment, defendants JASMIN ALEXANDRIA FOX, GARNETT ADAM PROPST, and LEVI ALLEN DOOLIN shall forfeit to the United States any firearms and ammunition involved in or used in the knowing violation of Title 18, United States Code, Sections 922(g)(1) and 922(a)(6), including but not limited to the firearm listed above.

This is pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

A TRUE BILL

[REDACTED]

Grand Jury Foreperson

03-20-2024
Date

TIMOTHY T. DUAX
United States Attorney

By:

Nicole Nagin

NICOLE L. NAGIN
Assistant United States Attorney

PRESENTED IN OPEN COURT
BY THE
FOREMAN OF THE GRAND JURY

And filed 3/20/2024
PAUL DE YOUNG, CLERK